

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	: <b>Chapter 11</b>
	:
<b>DELPHI CORPORATION, et al.</b>	: <b>Case No. 05-44481 (RDD)</b>
	:
<b>Debtors.</b>	: <b>Jointly Administered</b>
	:
-----:X	

**MOTION FOR THE ADMISSION *PRO HAC VICE* OF THOMAS M. FRANKLIN**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Pursuant to Local Rule 2090-1(b), Thomas M. Franklin (“Applicant”), moves this Court to grant admission to the United States Bankruptcy Court in the Southern District of New York *pro hac vice* to represent the Kansas Department of Health and Environment (“Creditor”) in this case and in contested matters and adversary proceedings herein, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm of The Franklin Law Firm, with offices at

Mailing Address: 300 UMB Bank Building  
1310 Carondelet Drive  
Kansas City, Missouri 64114

Telephone: (816) 942-1900

Facsimile: (816) 942-2671

Email: tmflaw@swbell.net

2. Since 1982, Applicant has been and presently is a member of and in good standing with the Bar of the State of Missouri. Applicant’s bar license number in the State of Missouri is 32358. Applicant has also been and presently is admitted to practice before several

courts of the United States, to include the United States Bankruptcy Courts of the Western District of Missouri and the District of Kansas.

3. Applicant is presently a member in good standing of the bars of the courts listed above.

4. Applicant is not the subject of grievance proceedings or involuntary removal proceedings of any state or federal court.

5. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses.

6. Applicant has read and is familiar with the Local Rules of the Southern District of New York and will comply with the standards of practice set out therein.

7. Applicant has been authorized for ECF access in Kansas, Missouri, Ohio and Texas.

WHEREFORE, Thomas M. Franklin, Applicant, prays that this Court enter an order permitting the admission of Thomas M. Franklin to the Southern District of New York *pro hac vice* for this case only.

Respectfully submitted,

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ATTORNEY FOR KANSAS DEPARTMENT  
OF HEALTH AND ENVIRONMENT

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for the Admission *Pro Hac Vice* of Thomas M. Franklin was served by overnight delivery on this \_\_\_\_ day of November, 2006 to:

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Atlicia M. Leonhard  
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Thomas M. Franklin